

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**ORIGINAL**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

**RECEIVED**

Appellate Case No. 2017-001147  
Civil Action No. 2016-CP-23-02113

NOV 09 2018

**SC Court of Appeals**

Aminah A. Richburg, .....Appellant,

v.

E.A. "Rico" Williams, Director, District One S.C. Basketball  
Officials Association and the South Carolina High School League ..... Respondents.

SECOND SUPPLEMENTAL RECORD ON APPEAL

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APPELLANT

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ATTORNEYS FOR RESPONDENT  
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LEAGUE

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ATTORNEY FOR RESPONDENT  
E.A. "RICO" WILLIAMS

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# Turner | Padget

REPLY TO:

Staci Elrod

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Writer's Direct Dial: (864) 552-4605

Direct Fax: (864) 552-4620

November 23, 2016

Ms. Aminah A. Richburg  
217 Plum Creek Lane  
Greenville, SC 29607

Re: Aminah A. Richburg v. E.A. Williams, et. al.  
Civil Action No.: 2016-CP-23-02113  
TPGL No.: 210.1204

Dear Ms. Richburg:

Enclosed please find the Defendant's Answers to Plaintiff's Second Set of Continuing Interrogatories in the above captioned matter.

With warmest regards, I remain

Very truly yours,

TURNER PADGET



Staci Elrod,  
Secretary to Sarah Day Hurley

/sle

Enclosures

cc: Michael Montgomery, Esquire

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF GREENVILLE )

IN THE COURT OF COMMON PLEAS  
  
Civil Action No. 2016-CP-23-02113

AMINAH A. RICHBURG, )  
 )  
Plaintiff, )  
 )  
vs. )

E.A. "RICO" WILLIAMS, DIRECTOR )  
DISTRICT ONE SC BASKETBALL )  
OFFICIALS ASSOCIATION AND THE )  
SOUTH CAROLINA HIGH SCHOOL )  
LEAGUE, )  
 )  
Defendants. )

**DEFENDANT'S ANSWERS TO  
PLAINTIFF'S SECOND SET OF  
CONTINUING INTERROGATORIES**

**TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:**

Defendant E.A. "Rico" Williams ("Defendant") herein responds to Plaintiff's Second Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure.

**GENERAL OBJECTIONS**

1. Defendant objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney-client, work-product doctrines. This Defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive

any objections that this Defendant may have with respect to the subsequent use of such information and this defendant respectfully reserves:

- a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;
- b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and
- c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. Defendant objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this Defendant.

4. Defendant objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.

5. Defendant objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this Defendant reserves the right to redact sensitive or proprietary information from any documents that he produces in response hereunder.

6. Defendant states that his agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Turner Padgett, 200 East Broad Street, Suite 250, 29601.

### INTERROGATORIES

1. Please provide a listing of first and last names of all SCBOA District I officials for 2013--2016.

**RESPONSE:** Defendant objects to this Interrogatory as overly broad, as it is not reasonably limited to the claims and issues in this case, and therefore, is not proportional to the needs of the case. Subject to and without waiving the foregoing objection, Defendant is not in possession of a list of all SCBOA District I officials from 2013 – 2016. Defendant would refer Plaintiff to the documents produced by the co-defendant, South Carolina High School League (“SCHSL”), which may contain information sought by this Interrogatory.

2. Please provide a listing of first and last names of SCBOA District I officials that officiated games for E.A. "Rico" Williams from 2013-2016.

**RESPONSE:** Defendant objects to this Interrogatory as vague and ambiguous, as it is not clear what is meant by “officials that officiated games for” Rico Williams. Defendant further objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case.

3. Please provide a listing of first and last names of Board members of the SCBOA District I that officiated games for E.A. "Rico" Williams 2013-2016.

**RESPONSE:** Defendant objects to this Interrogatory as vague and ambiguous, as it is not clear what is meant by “officials that officiated games for” Rico Williams. Defendant further objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case.

4. Please provide the E.A. "Rico" Williams business game schedules for SCBOA District One Board Members that officiated games through E.A. "Rico" Williams business from 2013-2016.

**RESPONSE:** Defendant objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case. Defendant also objects to this Interrogatory to the extent it is vague and ambiguous. Subject to and without waiving the foregoing objection, and as

Defendant understands this request, Defendant responds that, of the current Board members (names and addresses previously produced to Plaintiff), all but two of them have officiated non-League games. The two Board members who have not officiated non-League games are Bob Wnukowski and Al Bannister.

5. Please provide the game schedules for all basketball contest for SCBOA District One Board Members from 2013-2016 through the South Carolina High School League and SCBOA District One.

**RESPONSE:** Defendant objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case. Subject to and without waiving the foregoing objection, Defendant would refer Plaintiff to the response by South Carolina High School League to this Interrogatory.

6. Please provide a listing of first and last names of SCBOA District One Members terminated for future application for the past five years and reasons for termination.

**RESPONSE:** Defendant objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and seeks information that is not relevant to any of the claims or defenses in this case. Defendant further objects to the extent that the information sought is confidential, and disclosure of such confidential information, in the absence of a protective order, could cause irreparable harm.

7. Please provide the number of blocks for each member of the SCBOA District I officials for other officials that are members in the SCBOA District I through the Arbiter from 2013-2016. (The Plaintiff does not seek the names for all blocks for each member of District I SCBOA, only the number).

**RESPONSE:** Defendant objects to this Interrogatory to the extent such information is confidential. Defendant further objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case.

8. Please provide the number of school blocks for each member of the SCBOA District I officials from 2013-2016 through Arbiter. (The Plaintiff does not seek the names of the schools only the number).

**RESPONSE:** Defendant objects to this Interrogatory on the grounds that it is overly broad, potentially unduly burdensome, and not proportional to the needs of the case.

9. Please provide the first and last names of all females that are members of the SCBOA District I from 2013-2016.

**RESPONSE:** Defendant does not maintain information on the gender classification of SCBOA District I officials. Defendant would refer Plaintiff to the officials list and rankings produced by SCHSL, from which such information may be ascertained.

10. Please provide the first and last names of all males that are members of the SCBOA District I from 2013-2016.

**RESPONSE:** Defendant does not maintain information on the gender classification of SCBOA District I officials. Defendant would refer Plaintiff to the officials list and rankings produced by SCHSL, from which such information may be ascertained.

11. Please provide the ages of all SCBOA District I members along with first and last name from 2013-2016.

**RESPONSE:** Defendant does not maintain information about the ages of SCBOA District I officials.

12. Please provide the years of experience of all SCBOA District I members from 2013--2016.

**RESPONSE:** Defendant does not maintain information on the experience levels of SCBOA District I officials. Defendant would refer Plaintiff to the officials list and rankings produced by SCHSL, from which such information may be ascertained.

13. Please provide Training and Contract Documentation for District I Director, E.A. "Rico" Williams especially with regard to proper communication, confidentiality, grounds to terminate officials, sexual harassment, leadership, and solicitation from 2013-2016.

**RESPONSE:** Defendant has been an official for SCBOA District 1 for 22 years. Each year, as is required for all basketball officials, Defendant has participated in scrimmages, attended mandatory training meetings, studied basketball rules and regulations, watched films, received training and feedback from other officials, and

taken and passed annual tests for certification as a basketball official. In addition, Defendant has more than 20 years of experience as a basketball official. Defendant also follows the SCBOA Code of Ethics and the SCBOA Director Responsibilities.

14. Please provide Training and Contract Documentation for all South Carolina High School League Officials involved in this case especially with regard to SCHSL/SCBOA By-laws, Constitution, State of South Carolina operation requirements, proper communication, grounds to terminate officials, sexual harassment, confidentiality, leadership and solicitation from 2013-2016.

**RESPONSE:** Defendant would refer Plaintiff to the response provided by SCHSL.

15. Please provide the names and addresses of the supervising/ governing board members of the South Carolina High School League for 2013-2016.

**RESPONSE:** Defendant would refer Plaintiff to the SCHSL list of officers and Executive Committee members that is contained on the SCHSL website.

TURNER PADGET GRAHAM & LANEY P.A.

By: Sarah Day Hurley  
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ATTORNEYS FOR DEFENDANT  
E.A. "RICO" WILLIAMS

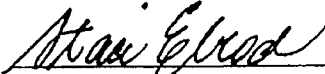
November 23, 2016

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENVILLE	)	Docket No.: 2015-CP-23-02113
	)	
AMINAH A RICHBURG ,	)	
	)	
Plaintiff,	)	<b>CERTIFICATE OF SERVICE</b>
	)	
v.	)	
	)	
E.A. "RICO" WILLIAMS, DIRECTOR,	)	
DISTRICT ONE SC BASKETBALL	)	
OFFICIALS AND THE SOUTH	)	
CAROLINA HIGH SCHOOL LEAGUE	)	
	)	
Defendants.	)	
_____	)	

On November 23, 2016, a copy of Defendant's Answers to Plaintiff's Second Set of Continuing Interrogatories was mailed to the parties listed below, postage prepaid and properly addressed as follows:

Ms. Aminah A. Richburg  
217 Plum Creek Lane  
Greenville, SC 29607

Michael Montgomery, Esquire  
Sowell Gray Stepp & Laffitte, LLC  
1310 Gadson Street  
Columbia, SC 29201

  
\_\_\_\_\_  
Staci Elrod,  
Secretary to Sarah Day Hurley

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Officials Association and the South Carolina High School League ..... Respondents.

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that the Second Supplemental Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

November 8, 2018

By: Sarah Day Hurley  
Sarah Day Hurley (SC Bar No. 16241)  
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